

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 13 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

THOMAS CARL CRIMMINS,

Defendant.

4:18CR1020 AGF/PLC

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Robert F. Livergood, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq. Further, the Government asserts:

1. Defendant is charged with Title 18, United States Code, Sections 2252A(a)(5)(B) (Possession of Child Pornography).
2. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the weight of the evidence against defendant;
 - (b) defendant's history and characteristics; and
 - (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.
3. There is a serious risk that the defendant will flee.
4. The defendant is a threat to the community.

5. There is a serious risk that the defendant will obstruct or attempt to obstruct justice.

WHEREFORE, the Government respectfully requests that the Court order the defendant to be detained pending trial.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Robert F. Livergood
ROBERT F. LIVERGOOD
Assistant United States Attorney